UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

CYNTHIA BARRY, Plaintiff,

v.

UMASS MEMORIAL MEDICAL CENTER, INC., ¹.

Defendant.

CIVIL ACTION NO. 4:16-CV-40104

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, the Defendant, UMass Memorial Medical Center, Inc. ("UMass Memorial" or "Defendant"), removes this action to the United States District Court for the District of Massachusetts. The grounds for removal are as follows:

- 1. This action arises out of the former employment relationship between Plaintiff
 Cynthia Barry (the "Plaintiff") and UMass Memorial. While employed by UMass Memorial the
 Plaintiff was a member of a bargaining unit represented by the State Healthcare and Research
 Employees (the "Union"). The Plaintiff's employment was subject to the terms and conditions
 set forth in the collective bargaining agreement between UMass Memorial and the Union. In her
 Complaint, the Plaintiff alleges, among other things, claims based upon the collective bargaining
 agreement.
- 2. Specifically, in Count V, the Plaintiff asserts a claim for declaratory relief seeking a declaration that, "her termination of employment [was] in violation of the SHARE (UMass contract)." Complaint, ¶ 80. In Count VII, the Plaintiff asserts a claim for breach of contract,

The Plaintiff's Complaint names the Defendant as "UMass Memorial Medical Center/UMass Memorial Healthcare. The proper name of the Plaintiff's former employer is UMass Memorial Medical Center, Inc.

alleging that, "she is a member of a union at UMass Memorial and covered by the union contract" Complaint, ¶ 86. She further alleges that she has standing under the contract and that "UMass Memorial violated the union contract by terminating her without cause, under false pretenses and without a full hearing with due process and the right to counsel." Complaint, ¶¶ 87 and 88. Although she does not specifically reference the collective bargaining agreement in Count VI, in that count she claims that, "UMass breached the contract of employment with Barry," which presumably is also a reference to the collective bargaining agreement. Complaint, ¶ 83.

3. This Court has original jurisdiction over this action under 28 U.S.C. § 1331, which may be removed to this Court pursuant to 28 U.S.C. § 1441. Under Section 301 of the Labor Management Relations Act ("LMRA"), 29 U.S.C. § 185, the district courts of the United States have original jurisdiction over any action brought for "violation of contracts between an employer and a labor organization representing employees in an industry affecting commerce." Section 301 of the LMRA confers federal jurisdiction over "suits for violation of contracts between an employer and a labor organization representing employees in an industry affecting commerce." Section 301 preempts a state-law claim "if the resolution of [that] claim depends upon the meaning of a collective bargaining agreement." BIW Deceived v. Local S6, Indus. Union of Marine & Shipbuilding Workers of Am., IAMAW Dist. Lodge 4, 132 F.3d 824, 829 (1st Cir. 1997) (quoting, Lingle v. Norge Div. of Magic Chef, Inc., 486 U.S. 399, 405-406 (1988)). "[T]he Supreme Court has deemed labor contracts within its scope 'creatures of federal law' and treats section 301 as a warrant both for removing to federal court state law claims preempted by section 301 and then dismissing them." Haggins v. Verizon New England, Inc., 648 F.3d 50, 54 (1st Cir. 2011) (quoting, O'Donnell v. Boggs, 611 F.3d 50, 53 (1st Cir. 2010).

"This doctrine applies most readily to state-law contract claims purporting to enforce CBAs covered by section 301" <u>Id.; see also, Deranamie v. Community Healthlink, Inc., et. al.,</u> 146 F.Supp.3d 407, 411 (D.Mass. 2015) (Hillman, J.) (dismissing state law contract claims as being preempted by Section 301 of the LMRA).

- 4. In this instance, in Counts V, VI, and VII, the Plaintiff has very clearly asserted claims alleging violations of a contract between an employer and a labor organization SHARE. Further, it is clear that resolution of such claims requires the interpretation of a collective bargaining agreement. As such, the Court has original jurisdiction over the Plaintiff's claims.
- 5. On June 27, 2016, copies of the Complaint and Summons were served on UMass Memorial. Accordingly, this notice of removal is being filed within the time period required by law, as set forth in 28 U.S.C. § 1446(b). As required by 28 U.S.C. § 1446(a), a copy of all process, pleadings and orders served upon UMass Memorial are attached to this Notice as **Exhibit A**, including a true and correct copy of the Complaint and a true and correct copy of the Summons.

WHEREFORE, Defendant requests that the above-captioned action now pending against it in Worcester Superior Court of the Commonwealth of Massachusetts be removed therefrom to this Court.

UMASS MEMORIAL MEDICAL CENTER, INC.

By its attorneys,

/s/ Michael P. Murphy

Robert L. Kilroy, BBO #636853 Michael P. Murphy, BBO #654053 Mirick, O'Connell, DeMallie & Lougee, LLP 1800 West Park Drive, Suite 400 Westborough, MA 01581-3926

Phone: (508) 898-1501 Fax: (508) 898-1502

Dated: July 18, 2016

CERTIFICATE OF SERVICE

I, Michael P. Murphy, hereby certify that this document(s), filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this day. Specifically, I hereby certify that I have this day served a copy of the foregoing document, by mailing a copy, first class mail, postage prepaid to Howard J. Potash, Esq., 390 Main Street, Suite 542, Worcester, MA 01608.

/s/ Michael P. Murphy
Michael P. Murphy

Date: July 18, 2016

EXHIBIT A

COMMONWEALTH OF MASSACHUSETTS

Worcester, ss.

Superior Court
Department of the Trial Court
of the Commonwealth
Civil Action

No. 16-0889A

CYNTHIA A. BARRY

Plaintiff (s)

SUMMONS

UMASS MEMORIAL MEDICAL CENTER: AND UMASS MEMORIAL HELATH CARE,

Defendant (s)

* To the above-named Defendant: Um 455 Memorial Medical Conten

Unless otherwise provided by Rule 13 (a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction of occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness Judith Fabricant Esquire, at Worcester, the 22nd day of June in the year of our Lord two thousand and Sixteen....

A True Copy Attest: Edward L Moynihan Constable of Worcester/ Disinterested Person Over 18

Clerk

NOTES:

- 1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure.
- When more than one defendant is involved, the names of all defendants should appear in the caption.If a separate summons is used for each defendant, each should be addressed to that particular defendant.

PLEASE CIRCLE TYPE OF ACTION INVOLVED: TORT — MOTOR VEHICLE TORT — CONTRACT EQUITABLE RELIEF — CH. 93A — MEDICAL MALPRACTICE — OTHER.

NOTICE TO DEFENDANT: You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein AND also file the original in the Clerk's Office, Superior Court, Room 1008.

Publish Publ	CIVIL ACTION COVER SHEET	DOCKET NUMBER		Trial Court The Superi	of Massachu or Court	isetts (
ADDRESS: 125 Blomlagh Road Water Man Of 1520 Uthers Momorial Healthcase	PLAINTIFF(S): Cynthia Barry					
UMass Memorial RestRuctors ATTGENET: Noving J. Possis, Espain ADDRESS: 118 Bislinord Bireat, Worcester, MA and 55 Lake Apenua; Worcester, MA 404	ADDRESS: 126 Stonleigh Road			Worcester	·	
ADDRESS: 118 Believed Street, Moroseler, MA and 55 Lace Avenue; ADDRESS: 118 Believed Street, Woroseler, MA and 55 Lace Avenue; Woroseler, MA Woroseler, MA ADDRESS: 118 Believed Street, Woroseler, MA and 55 Lace Avenue; Woroseler, MA Woroseler, MA ADDRESS: 118 Believed Street, Woroseler, MA and 55 Lace Avenue; Woroseler, MA Woroseler, MA Bibl: AD4100 TYPE OF ACTION AND TRACK DESIGNATION (see reverse slde) CODE NO. TYPE OF ACTION (specify) TRACK HAS A JURY CLAIM BEEN MADE? A04 Contract Dispute F Yes Yes No STATEMENT OF DAMAGES PURSUANT TO G.L. c. 212, § 3A The fallowing is a full, itembred and detailed statement of the facts on which the undersigned plantiff or pleintiff counsel relies to determine money damages files from, disregard double or treble demage claims; indicate eingle damages only. TORIC CLAIMS (attach additional sheets as necessary) A. Documented medical expenses is diste: 1. Total hospital expenses is diste: 1. Total hospital expenses is diste: 1. Total physical therapy expenses expenses \$ 3. Total other expenses (describe below) \$ Subtotal (A): \$ B. Documented lost weige and compensation to date \$ Subject of property damages to deted \$ Subcommented lost weige and compensation to date \$ Subcommented lost weige and compensation to date \$ Subcommented increased total respective property damages to deted \$ Subcommented increased total respective property damages to deted \$ Subcommented increased total respective property damages to deted \$ Subcommented flower of damages (describe below) \$ Subtotal (A): \$ CONTRACT CLAIMS (attach additional sheets as necessary) FigWais a detailed description of damage; Plaintiff was wrongfully discharged from employment. TOTAL: \$ CONTRACT CLAIMS (attach additional sheets as necessary) FigWais a detailed description of damage; Plaintiff was wrongfully discharged from employment. TOTAL: \$ CONTRACT CLAIMS (attach additional sheets as necessary)	Holden, MA 01520		DEFENDANT(S):	UMass Memorial Melcal Center	er and	
ADDRESS: 118 Belimont Street, Worcester, MA and 55 Lake Avenue; Worcester, MA 01658 Worcester, MA 01658 ## CODE NO. TYPE OF ACTION (specify) TRACK HAS A JURY CLAIM BEEN MADE? A04 Contract Dispute F Vers No. ## "Other" please describe: **STATEMENT OF DAMAGES PURSUANT TO G.L. c. 212, § 3A Tile following is a full, iteratized and detailed statement of the facts on which the undersigned plaintiff or plaintiff coursel relies to determine money damages fries fyrm, claregard double or trable damage claims; indicate single damages only. **TORT CLAIMS** (attach additional shocks as necessary) ## Documented medical expenses io date: 1. Total hospital expenses io date: 2. Total doctor openses. 3. Total doctor openses. 3. Total physical therapy expenses. 3. Total object expenses (describe below). \$ Subtotal (A): \$ Copyright of damages to dated. \$ Copyright of the physical therapy expenses and compensation to date. \$ Copyright of the physical therapy expenses and compensation to date. \$ Copyright of the physical therapy expenses and compensation to date. \$ Copyright of the physical therapy expenses and compensation to date. \$ Copyright of the physical therapy expenses and compensation to date. \$ Copyright of the physical therapy expenses and copyright of the physical therapy expenses. \$ Copyright of the physical therapy expenses and copyright of the physical therapy expenses. \$ Copyright of the physical therapy expenses and copyright of the physical therapy expenses. \$ Copyright of the physical therapy expenses and copyright expenses. \$ Copyright of the physical therapy expenses.			UMass Memorial He	palthcare		
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CIVIL ACTION COVER SHEET INSTRUCTIONS SELECT CATEGORY THAT BEST DESCRIBES YOUR CASE

AC Actions involving the State/Munic	cipality.*		ER Equitable Remedies		RP Real Property	
AA1 Contract Action involving Common	wealth.		D01 Specific Performance of a Contract	(A) :	C01 Land Taking	/r=\
Municipality, MBTA, etc.	(A)		D02 Reach and Apply	(F)	C02 Zoning Appeal, G.L. c. 40A	(F) (F) (X) (F)
AB1 Tortious Action involving Commony			D03 Injunction	(F)	C03 Dispute Concerning Title	(F)
Municipality, MBTA, etc.	(A)	• .	D04 Reform/ Cancel Instrument	(F)	C04 Foreclosure of a Mortgage	(F)
AC1 Real Property Action Involving		:	D05 Equitable Replevin	(F)	C05 Condominium Lien & Charges	(X)
Commonwealth, Municipality, MBT	A etc. (A)		D06 Contribution or Indemnification	(F)	C99 Other Real Property Action	
AD1 Equity Action involving Commonwe		٧.	D07 Imposition of a Trust	(A) ·	out office readily readon	(P)
Municipality, MBTA, etc.	(A) .		D08 Minority Shareholder's Suit	(A)	MC Miscellaneous Civil Actions	
AE1 Administrative Action Involving	4.4		D09 Interference in Contractual Relationship	(F) ,	THE WINDSHIP COME OF THE PARTY	
Commonwealth, Municipality, MBT/	A.etc. (A)		D10 Accounting	(A)	E18 Foreign Discovery Proceeding	w
96 (1) 20 (2)	40.5. 6.4		D11 Enforcement of Restrictive Covenant	(F)	E97 Prisoner Habeas Corpus	(X)
CN Contract/Business Cases	i	:	D12 Dissolution of a Partnership	(F)	E22 Lottery Assignment, G.L. c. 10 §28	(X) (X)
		٠.	D13 Declaratory Judgment, G.L., c.231A	(A)	222 Colory 7100 grillioni, 4.2, 6, 10 320	(^)
A01 Services, Labor, and Materials	(F)		D14 Dissolution of a Corporation	(F)	AB Abuse/Harassment Prevention	
A02 Goods Sold and Delivered	(F)		D99 Other Equity Action	(F)	: · · · · · · · · · · · · · · · · · · ·	
A03 Commercial Paper	(F)	٠		. ,	E15 Abuse Prevention Petition, G.L. c. 209A	/Y\
A04 Employment Contract	(F)		PA Civil Actions Involving Incarcerated Pa	† '	E21 Protection from Harassment, G.L. c. 258	(^) }E#/Y\
A06 Insurance Contract	(F)		PA GIVITACTIONS INVOIVING INCARCERATED PE	י בענונ) <u>L(</u> \)
A08 Sale or Lease of Real Estate	(F)				AA Administrative Civil Actions	
A12 Construction Dispute	(A)		PA1 Contract Action involving an		TETT STATE OF THE PROPERTY OF	
A14 Interpleader	(F)	•	Incarcerated Party	(A)	E02 Appeal from Administrative Agency,	
BA1 Governance, Conduct, Internal			PB1 Tortious Action Involving an	2.4	G.L. c. 30A	/٧١
Affairs of Entities	(A)		Incarcerated Party	(A)	E03 Certiorari Action, G.L. c,249 §4	(X)
BA3 Liability of Shareholders, Directors,			PC1 Real Property Action Involving an		E05 Confirmation of Arbitration Awards	121
Officers, Partners, etc.	(A)		Incarcerated Party	(F)	E06 Mass Antitrust Act, G. L. c. 93 §9	(X)
BB1 Shareholder Derivative	(A)		PD1 Equity Action involving an .		E07 Mass Antitrust Act, G. L. c. 93 §8	(2)
BB2 Securities Transactions	(A)		Incarcerated Party	(F)	E08 Appointment of a Receiver	121
BC1 Mergers, Consolidations, Sales of	. ,		PE1 Administrative Action involving an		E09 Construction Surety Bond, G.L. c. 149	(//)
Assets, Issuance of Debt, Equity, et	tc. (A)		Incarcerated Party	(F)	§§29, 29A	/Δ1
BD1 Intellectual Property	(A)				E10 Summary Process Appeal	(A) (X) (X) (X) (A)
BD2 Proprietary Information or Trade	, ,		TR Torts		E11 Worker's Compensation	ίχί
Secrets	(A)				E16 Auto Surcharge Appeal	ίχί
BG1 Financial Institutions/Funds	(A)		B03 Motor Vehicle Negligence - Personal	,,,,,,	E17 Civil Rights Act, G.L. c.12 §11H	ίΑί
BH1 Violation of Antitrust or Trade	, ,		Injury/Property Damage	(F)	E24 Appeal from District Court	4.4
Regulation Laws	(A)		B04 Other Negligence - Personal	/He/\	Commitment, G.L. c.123 §9(b)	(X)
A99 Other Contract/Business Action - Sp	ecify (F)		Injury/Property Damage	(F)	E25 Pleural Registry (Asbestos cases)	17.7
			B05 Products Liability	(A)	E94 Forfeiture, G.L. c265 §56	(X)
			B06 Malpractice - Medical / Wrongful Death	(A)	E95 Forfeiture, G.L. c.94C §47	(X) (F) (X)
			B07 Malpractice - Other	(A)	E99 Other Administrative Action	čχί
Choose this case type if ANY party is the			B08 Wrongful Death, G.L. c.229 §2A	(A)	Z01 Medical Malpractice - Tribunal only,	.,,
Commonwealth, a municipality, the MBT			B15 Defamation	(A) ·	G.L. c. 231 §60B	(F)
other governmental entity UNLESS your			B19 Asbestos	(A)	Z02 Appeal Bond Denial	(F) (X)
case type listed under Administrative Civ	Il Actions		B20 Personal Injury - Slip & Fall	(F) :		٧٠,
(AA)			B21 Environmental	(F)	SO Sex Offender Review	
100 mg			B22 Employment Discrimination	(F)		
f Choose this case type if ANY party is a			BE1 Fraud, Business Torts, etc.	(<u>A</u>)	E12 SDP Commitment, G.L. c. 123A §12	(X)
incarcerated party, UNLESS your case is		٠.	B99 Other Tortlous Action	(F)	E14 SDP Petition, G.L. c. 123A §9(b)	(X) (X)
type listed under Administrative Civil Acti			•			
or is a Prisoner Habeas Corpus case (E9	17).	٠.	.*		RC Restricted Civil Actions	
		•	•	•	:	
Maria de la companya	•		,		E19 Sex Offender Registry, G.L. c.6 §178M	(X)
			•		E27 Minor Seeking Consent, G.L. c.112 §128) (X)
9.4	7	ran	SFER YOUR SELECTION TO THE FA	CE SHEET	,	
EXAMPLE:		1 to		•	·.	
GAAWIF LE						
CODE NO.	TYPE OF A	CTIO	(specify) TRACK	has a j	URY CLAIM BEEN MADE?	

STATEMENT OF DAMAGES PURSUANT TO G.L. c. 212, § 3A

Motor Vehicle Negligence-Personal Injury

X YES

П мо

DUTY OF THE PLAINTIFF - The plaintiff shall set forth, on the face of the civil action cover sheet (or attach additional sheets as necessary), a statement specifying the facts on which the plaintiff relies to determine money damages. A copy of such civil action cover sheet, including the statement as to the damages, shall be served with the complaint. A clerk-magistrate shall not accept for filing a complaint, except as otherwise provided by law, unless it is accompanied by such a statement signed by the attorney or pro se party.

DUTY OF THE DEFENDANT - If the defendant believes that the statement of damages filed by the plaintiff is inadequate, the defendant may file with his/her answer a statement specifying the potential damages which may result if the plaintiff prevails.

A CIVIL COVER SHEET MUST BE FILED WITH EACH COMPLAINT.
FAILURE TO COMPLETE THIS COVER SHEET THOROUGHLY AND ACCURATELY
MAY RESULT IN DISMISSAL OF THIS ACTION.

COMMONWEALTH OF MASSACHUSETTS TRIAL COURT SUPERIOR COURT DEPARTMENT

WORCESTER, ss.		CIVIL ACTION NO.
CYNTHIA A. BARRY,)	
Plaintiff)	
	·)	COMPLAINT AND
v.)	CLAIM FOR JURY TRIAL
	Ś	•
UMASS MEMORIAL MEDICAL CEN	VTER)	
UMASS MEMORIAL HEALTHCARE	•	
Defendant	' '	

I. Parties

- 1. The plaintiff, Cynthia A. Barry (hereinafter "Barry"), is an individual who resides at 126 Stoneleigh Road, Holden, Worcester County, Massachusetts 01520 and a former respiratory therapist at UMass Memorial until November 17, 2015.
- 2. The defendant, UMass Memorial Medical Center/UMass Memorial Healthcare (hereafter "UMass") is a medical facility located at 118 Belmont Street, Worcester, Worcester County, Massachusetts and 55 Lake Avenue, North, Worcester, Worcester County, Massachusetts. Mrs. Barry worked the Belmont Street hospital known as the Memorial Campus.

II. Cause of Action

3. This is an action by Barry for wrongful discharge; breach of contract; defamation; slander; intentional infliction of emotional distress; and declaratory relief pursuant to M.G.L. c.231a regarding termination of employment as a respiratory therapist on November 17, 2015.

III. Facts Common To All Counts

- 4. Barry is a licensed respiratory therapist hired on June 18, 2007 and terminated on November 17, 2015.
- 5. Barry's job title is Therapist, Respiratory II, Worcester Memorial Campus at the pay rate of \$33.03/ hour at her termination in November last year.
- 6. Barry had an unblemished record during eight (8) years of employment and carried out her duties in accordance with protocol and with instructions issued by physicians and

in compliance with orders issued by the physicians. Barry is licensed by the Commonwealth of Massachusetts.

- 7. A review of the records produced by Human Resources at UMass Memorial shows only one verbal warning issued on July 28, 2014. In that report, Barry followed protocol issued in an order by a physician, as she was obligated to do unless said order was changed by a physician. A nurse cannot change a physician's order.
- 8. Barry was covered by a UMass contract with SHARE and the contract was in force at UMass Memorial at the time of termination/discharge.
- 9. Disciplinary steps were covered by the contract which includes Step 1 Counseling; Step 2 Documented verbal Warning; Step 3 Written Warning; and Step 4 and beyond Termination. Proper steps were not followed.
- 10. On the night of October 31, 2015, Barry worked the night shift (usual shift) and retrieved respiratory medication twice for the patient using the correct procedure for accessing drugs. The instructions in the chart were followed issued by the physicians. No problem occurred and Barry gave the patient the drugs as prescribed.
- 11. Barry was proficient in carrying out her duties as evidenced by the excellent reviews she received.
- 12. On November 1, 2015, Barry was called and told not to come to work and put on paid investigative leave without explanation.
- 13. On November 2, 2015, Barry was called to a meeting and accused of breaking an envelope and taking narcotic medications. Barry denied all allegations.
- 14. Barry responded that she only accessed respiratory medications for which she was authorized to do.
- 15. Barry was threatened that she would be reported for committing a crime. She denied any wronging doing several times. Connie St. Amand, the Human Resource Representative, at the meeting, mocked her and told her she was guilty.
- 16. Barry contacted counsel to represent her interests who contacted Ms. St. Amand and was told "lawyers are not allowed in any meeting or to advise an employee. We don't allow lawyers at UMass." The comments were extremely rude and made in an angry tone to counsel.
- 17. Counsel learned the General Counsel's office of UMass was involved. UMass was allowed counsel, but Barry was denied representation.
- 18. Ms. St. Amand wanted a second meeting but would not allow counsel for Barry to attend or be available to advise her. Mrs. Barry did not attend the meeting since counsel was not allowed to advise or attend with her.

- 19. No evidence was given of wrongdoing to Barry until February 2, 2016 some three (3) months after being placed on administrative leave. At a meeting, no information was forthcoming. The records produced by UMass Memorial demonstrate no evidence of wrongdoing against Barry and state others are responsible for the monitoring of narcotic drugs.
- 20. At all times, Barry had authority to access the respiratory drawer. The drawer contained Albuterol used for patients on a respirator. It is correct that the same drawer contained Opioids. Barry was not responsible for count or any duties for Opioids. The nurses have sole responsibility and not a respiratory therapist.
- 21. A review of the records produced by UMass Memorial demonstrates the following:

Debra Miville was the responsible nurse on October 31st to November 1st, 2015. Christina Wilcox was a nurse on duty the same night. Heather was another nurse on duty on March 11th. Heather counted 72 for Oxycodone. Debra and Christina changed the count. Pills were crumbled up at the bottom of the bin. "Debra stated she fixed the count. Deb stated "my error – I did call Lori, nursing supervisor. "We just fixed the count so we could take care of our patients".

- 22. The pharmacy was not called by the nurses.
- 23. "Deb stated that during the night, there were other people on the floor including an equipment employee, UTS (cleaning a new employee)". There were three (3) registered nurses and one (1) PCA on the floor.
- 24. The nurses called Lori McDonald and George McGovern from the pharmacy. They asked Jeff from pharmacy for a report on the Pyxis. Demetri came to report the drawer and Paul K was called from pharmacy.
- 25. Debra stated that "not reporting a discrepancy was her stupidity. Lynn Starband said "it happens everywhere because the nurses are busy".
- 26. Based on these facts, Cynthia Barry was blamed who had no input or responsibility for Oxycodone in the narcotic drawer. Deb stated" I just didn't do it, it was busy. We had issues with Sorian and Mac down time."
- 27. The so-called "link" to Cynthia Barry is totally false and not advanced in good faith by UMass Memorial.
- 28. UMass Memorial blames other discrepancies on Cynthia Barry on November 1, 2015 and other dates. The allegations are totally baseless from UMass own records (See Exhibit B with Affidavit of Counsel attached hereto and incorporated herein by reference).

1.

- 29. Will, the SHARE representative stated his opinion was that Cynthia Barry "took the meds". He had no information just his "baseless" opinion.
- 30. The nurses were threatened with termination by UMass for not following correct narcotic procedure. A nurse lost her job was not counting the narcotics refer to Exhibit B.
 - 31. Connie St. Amand threatened Barry with losing her job.
- 32. Nurses were told "you should have wasted cracked pills since you can't give them to a patient." There is doubt any pills were even missing.
- 33. Christina reported discrepancies not resolved by the nurses "we weren't sure if there were 68 or 69 pills. The nurses were looking for pills probably not missing." We didn't know if we should count the pills in bubble pack."
- 34. UMass has created chaos with the nurses since they are responsible with so-called missing narcotics.
 - 35. Discrepancies in narcotic drugs are all over the place at UMass.
- 36. Cynthia Barry has no responsibility. UMass made Mrs. Barry a "scapegoat" to protect the nurses who violated the rules.
- 37. UMass states "[w]e have concluded our investigation of multiple pyxis discrepancies. We conclude that a common individual (Cynthia Barry), a respiratory therapist was involved in four (4) different discrepancies. The records produced by UMass state otherwise by conclusive evidence. The accusation is totally false and not advanced in good faith. UMass picked on Cynthia Barry to protect the nurses since they had to find someone to blame to satisfy the discrepancies at UMass under pressure from the Department of Public Health for Drug Discrepancy.
- 38. UMass has refused to allow collection of unemployment compensation but did give Barry a favorable job reference.
- 39. UMass Memorial has a serious problem with drug inventory for which Barry has no responsibility. Her only duty is to retrieve correct respiratory medications for patients on respirators as ordered by the attending physicians. She has always carried out those duties correctly and professionally without exception.
- 40. On November 18, 2015, Barry received a letter (see Exhibit "A" attached hereto and incorporated herein by reference) from Luanne Hills BA, RRT and Lisa Gillum, MSN, RN, terminating her employment. The letter was written by Connie St. Amand.
- 41. No evidence of theft of drugs by Barry have been produced; no response to letters have been received, except on January 6, 2016, some three (3) months latter records produced were personnel records and additional records on February 2, 2016.

- 42. It appears there is no evidence of theft by Barry exists. No witness statements or other records have been produced to support said allegations. Many people have access to the drug room.
- 43. UMass Memorial has had poor drug inventory policies for years, which is the responsibility of Dr. Eric Dixon, CEO and other physicians and pharmacists at UMass, not Barry.
- 44. The action against Barry is arbitrary; capricious and plainly untrue and not advanced in good faith.
- 45. Ms. Connie St. Amand is not licensed to administer any drug policy at UMass or elsewhere. She is not competent in drug policy.
 - 46. Luanne Hills did not provide any evidence of wrongdoing.
- 48. There is no proof that Barry did anything but her lawful duty as a Respiratory Therapist with an unblemished record.
- 49. It appears the allegations against Barry are a fabrication and outright lie by Ms. Connie St. Amand.
- 50. As a result of the termination of November 17, 2015, Barry has lost income, loss of her good name and reputation at UMass and elsewhere, been a victim of defamation and libel and suffered extreme emotional pain as a result of the action of UMass Memorial and certain of its employees.
 - 51. Dr. Eric Dixon, CEO, has declined, to date, to intervene.
- 52. Barry has suffered and continues to suffer emotional and physical pain and total humiliation.
- 53. UMass Memorial, as required by law, has not reported any violation of DEA, state or local police or licensing authorities as they are so required to do.
- 54. No report was done since absolutely no evidence of wrongdoing exists against Barry.
 - 55. The whole incident of drug theft is a total fabrication.
- 56. UMass Memorial has denied Barry unemployment compensation in furtherance of their fabrication of Gillum's and Hills' and St. Amand and others against Barry.
- 57. UMass Memorial instructed Barry on removal of respiratory drugs which she followed completely in every aspect on each and every day of her employment.

- 58. Although the narcotics drawer opened at the same time as the respiratory drawer; Barry never interfaced with the narcotics drawer. Again, Barry had no responsibility for monitoring the narcotics drawer in any aspect whatsoever and was so instructed by her supervisors in respiratory therapy on many occasions.
- 59. The inclusion of the respiratory drawer with the narcotics drawer violates public policy and places the public in danger as narcotic medications require more supervision by registered nurses who must count and certify the counts on each shift change.
- 60. UMass Memorial has accused Barry of removing narcotic drugs without substantial or any forensic evidence and merely all eyes on four occasions over a week range of time that there were discrepancies in the Pyxis used by her in accordance with the instruction of her employer.
- 61. At all times during the alleged occasions, Barry operated the Pyxis machines correctly; secured the proper doses of respiratory drugs ordered by the physician and administered the correct dosage to the patient successfully and without incident. On one occasions, Barry reported the discrepancy and followed proper procedure.
- 62. Throughout her eight (8) year employment at UMass Memorial, only on one occasion was she criticized for not changing a dose requested by a nurse. Only a physician can change a dosage of medication and Barry followed the correct protocol.

Count I - Wrongful Discharge

- 63. Plaintiff, Cynthia A. Barry, re-asserts and re-avers paragraphs 1 through 62 of the within Complaint as if fully set forth herein.
- 64. Luanne Hills, Lisa Gillum and St. Amand, acting on behalf of UMass Memorial wrongfully discharged Cynthia A. Barry on November 17, 2015 without just cause and falsely accused Barry of stealing narcotics on the night of October 31, 2015.
- 65. As a result, Barry has suffered damages of body and mind and loss of income and benefits as a Respiratory Therapist at UMass Memorial, which damages continue and Barry has been humiliated by her co-workers as a result of the rumors of her termination.
- 66. Barry has suffered permanent damage to her career for the next fifteen (15) years which can never be repaired.
- 67. The conduct of UMass Memorial is egregious in every way possible and cruel conduct by an institution held in high esteem in the Worcester and Massachusetts business community.

WHEREFORE, the Plaintiff, Cynthia A. Barry, claims damages in an amount found appropriate by this Honorable Court/Finder of Fact together with costs, interests and reasonable attorney's fees allowed by law.

Count II - Wrongful Discharge

- 68. Plaintiff, Cynthia A. Barry, re-asserts and re-avers paragraphs 1 through 67 of the within Complaint as if fully set forth herein.
- 69. UMass Memorial has defamed Barry by accusing her of theft of narcotics all totally untrue.
- 70. As a result, Barry has been damaged she was held up to ridicule; humiliation both personally and professionally; and unable to find hospital employment as a respiratory therapist. Said damages can never be undone. Her professional career has been ruined.
 - 71. As a proximate result, Barry has been permanently damaged.

WHEREFORE, the Plaintiff, Cynthia A. Barry, claims damages in an amount found appropriate by this Honorable Court/Finder of Fact together with costs, interests and reasonable attorney's fees allowed by law.

Count III - Libel

- 72. Plaintiff, Cynthia A. Barry, re-asserts and re-avers paragraphs 1 through 71 of the within Complaint as if fully set forth herein.
- 73. UMass Memorial has by implication created written records causing damages of libel against Barry by accusing her of theft of narcotics without evidence constituting a complete fabrication.
 - 74. As a result, Barry has been damaged.

WHEREFORE, the Plaintiff, Cynthia A. Barry, claims damages in an amount found appropriate by this Honorable Court/Finder of Fact together with costs, interests and reasonable attorney's fees allowed by law.

Count IV - Intentional Infliction of Emotional Distress

- 75. Plaintiff, Cynthia A. Barry, re-asserts and re-avers paragraphs 1 through 74 of the within Complaint as if fully set forth herein.
- 76. As of proximate result of the accusations of the theft of narcotic drugs, and termination of employment, Barry has suffered severe emotional distress.
- 77. The action of employees of UMass Memorial are unwarranted and vicious and nature and intended to harm Barry. The acts are utterly devoid of legitimate business or professional behavior.

WHEREFORE, the Plaintiff, Cynthia A. Barry, claims damages in an amount found appropriate by this Honorable Court/Finder of Fact together with costs, interests and reasonable attorney's fees allowed by law.

Count V - Declaratory Relief - M.G.L. c.231A

- 78. Plaintiff, Cynthia A. Barry, re-asserts and re-avers paragraphs 1 through 77 of the within Complaint as if fully set forth herein.
- 79. Barry requests the Court to declare that her employment termination by UMass-Memorial was arbitrary, capricious, unreasonable and not advanced in good faith.
- 80. Barry requests the Court to declare her termination of employment in violation of the SHARE (UMass contract).
- 81. Barry requests the Court to declare no credible evidence has been produced of any theft of narcotics by Barry and that she accessed respiratory drugs in accordance with instructions of physicians and administered correctly to patients.

WHEREFORE, the Plaintiff, Cynthia A. Barry, claims damages in an amount found appropriate by this Honorable Court/Finder of Fact together with costs, interests and reasonable attorney's fees allowed by law.

Count VI - Breach of Contract - Employees

- 82. Plaintiff, Cynthia A. Barry, re-asserts and re-avers paragraphs 1 through 81 of the within Complaint as if fully set forth herein.
- 83. UMass breached the contract of employment with Barry with false accusations of drug theft knowing full well that said accusations were false and untrue.
 - 84. As a result, Barry has been damaged.

WHEREFORE, the Plaintiff, Cynthia A. Barry, claims damages in an amount found appropriate by this Honorable Court/Finder of Fact together with costs, interests and reasonable attorney's fees allowed by law.

Count VII - Breach of Contract - UMass Memorial

- 85. Plaintiff, Cynthia A. Barry, re-asserts and re-avers paragraphs 1 through 84 of the within Complaint as if fully set forth herein.
- 86. Barry asserts she is a member of the union at UMass Memorial and covered by the union contract requiring several steps before termination and the right to hearing and due process including the right to counsel.

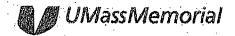
- 87. Barry has standing under the contract.
- 88. UMass Memorial violated the union contract by terminating her without cause, under false pretenses and without a full hearing with due process and the right to counsel.

WHEREFORE, the Plaintiff, Cynthia A. Barry, claims damages in an amount found appropriate by this Honorable Court/Finder of Fact together with costs, interests and reasonable attorney's fees allowed by law.

RESPECTFULLY SUBMITTED, Plaintiff, Cynthia A. Barry, By her attorney,

Howard J. Potash, Esquire 390 Main Street, Suite 542 Worcester, MA 01608 (508) 754-2624 BBO# 404160

Dated: May 31, 2016



Medical Center
Department of Human Resources

67 Millbrook Street North Building, 2nd Floor Worcester, MA 01606 Tel: 508-334-5100 Fax: 508-793-5691 www.umassmemorial.org

VIA OVERNIGHT MAIL AND U.S. MAIL EXHIBIT "A"

November 17, 2015

Cynthia Barry 126 Stoneleigh Rd. Holden, MA 01520

RE: Notification of Termination of Employment

Dear Cynthia:

Following the completion of the investigation that we discussed at our meeting on November 2, 2015, a decision has been reached that your employment with UMass Memorial Medical Center/UMass Memorial Health Care is terminated effective as of the date of this letter.

Please return all hospital property, including hospital identification card, KRONOS badge, etc to Human Resources, 67 Millbrook St., Worcester, MA 01605. Please call Larry Owens at 508-713-7853 to arrange for a time to collect your belongings from your locker.

In addition to your final paychecks (must be cashed), enclosed for your review is the booklet, "How to File for Unemployment Insurance Benefits" and the "Benefit Termination Fact Sheet". If you have any questions or concerns, please contact Connie St. Amand, Human Resources Business Partner at (508) 334-5070.

Sincerely,

Luanne Hills, BS, RRT (CSA)

Luanne Hills, BS, RRT

Manager, Respiratory Department

Us UZN weller meab

Lisa Gillum, MSN, RN

ACNO, Memorial Campus

cc: Personnel File

Enclosures

The Clinical Partner of the University of Massachusetts Medical School

EXhibit "B"

COMMONWEALTH OF MASSACHUSETTS TRIAL COURT SUPERIOR COURT DEPARTMENT

WORCESTER, ss.		CIVIL ACTION NO.
CYNTHIA A. BARRY, Plaintiff)	: : :
v.))) :
UMASS MEMORIAL MEDICAL CEN UMASS MEMORIAL HEALTHCARE, Defendant		•

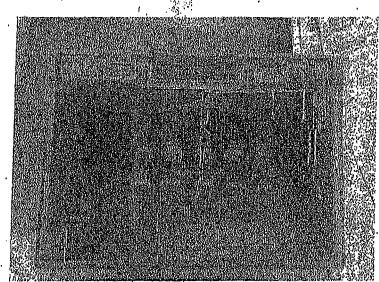
AFFIDAVIT OF HOWARD J. POTASH

NOW COMES, Howard J. Potash, under oath and deposes and states as follows:

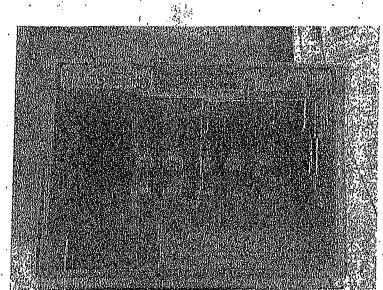
- 1. My name is Howard J. Potash and I am an attorney licensed to practice law in the Commonwealth of Massachusetts, which a principal place of business at 390 Main Street, Suite 542, Worcester, Massachusetts 01608.
- 2. I am the attorney for the Plaintiff, Cynthia A. Barry, who was terminated from her employment as a respiratory therapist by the Defendants.
- 3. I received the attached documents, which purport to be the investigative records about missing narcotics on or about October 31, 2015.
- 4. I received the records from Michael P. Murphy, an attorney for Mirick O'Connell, who represents UMass Medical Center and UMass Memorial.
 - 5. I believe the records to be authentic.

Signed under the pains and penalties of perjury this 11th day of February, 2016.

Howard J. Potash, Esquire



- 11/1/2015 report to DPH and DEA Involving a loss of 6 tablets of oxycodone 5 mg on South 3. 2 discrepancies of #3 were created in pyxis, After the 2nd discrepancy was created, it was noted that this cubie pocket too was tampered with and had the same opening in the top of the cubie pocket.
 - O We reviewed all staff accessing drawers—between 10/23 and 10/28 on South 6 when discrepancy found and compared to the staff accessing the South 3 drawer on 10/31 and 11/1. CB was the only person that accessed both drawers. Neither nurse on South 3 from 10/31 to 11/1 had been 8n South 6 during that time range.
 - o in all cases, albuterol was in the same drawer as the opioid. We reviewed the nurses medication history pre discrepancy. No issues identified with med pulls and administrations with 1 exception that had been addressed previously. PO opioids have been removed from the drawers in which albuterol and ipratropium cubies are stored.
- 4 occurrences have been linked to CB. CB has been terminated.



- 11/1/2015 report to DPH and DEA involving a loss of 6 tablets of oxycodone 5 mg on South 3. 2 discrepancies of #3 were created in pyxis. After the 2nd discrepancy was created, it was noted that this cubie pocket too was tampered with and had the same opening in the top of the cubie pocket.
 - O We reviewed all staff accessing drawers—between 10/23 and 10/28 on South 6 when discrepancy found and compared to the staff accessing the South 3 drawer on 10/31 and 11/1. C8 was the only person that accessed both drawers. Neither nurse on South 3 from 10/31 to 11/1 had been on South 6 during that time range.
 - o In all cases, albuterol was in the same drawer as the oploid. We reviewed the nurses medication history pre discrepancy. No issues identified with med pulls and administrations with 1 exception that had been addressed previously. PO oploids have been removed from the drawers in which albuterol and ipratropium cubies are stored.
- 4 occurrences have been linked to CB. CB has been terminated.

Debra Miville -

We met with Ms. Miville on November 4, 2015 at 7 AM.

Present at this meeting: Lisa Gillum, Associate Chief Nurse Officer, Brian Brisbois, Nurse Manager (S3) Michele Montalvo, Business Partner, Lynne Starbard, MNA Union Rep. Connie St. Amand, Business Partner

- Debra stated that she was the resource nurse that night, and was running late, so she did not get patient care report.
- Christina Wilcox called her at about 12 AM. Christina needed to get Oxy for patient, she did count and it was wrong so she called Deb. Heather the 3-11 nurse was in the drawer previously, the count was correct. Her count was 72, but when they counted it was 69. One sleeve was crumpled and one pill slot was opened and pill was crumpled up at the bottom of the bin. They first counted 68, but the machine did not accept it so they counted the pill that was tampered with, and added one to make it 69 and it was accepted. Three pills were missing because previous count was 72.
- Deb stated that she and Christina fixed the count. Deb stated, "my error, I did not call
 Lori (supervisor)". She stated, "We just fixed the count so we could continue taking care
 of our patients".
- Lisa stated this was more than just a discrepancy. She had an open crumpled pack as well, so there was tampering.
- We asked her what the process was and she stated that she should have called the
 pharmacy and the nursing supervisor. Deb.stated, "I just didn't do it, it was busy. We
 had issues with Sorian and Mac down time".
- Lisa stated that there is never a reason to not call the supervisor. "We fixed the numbers. Deb stated that during the night there were other people on the floor including, an equipment employee, UHS new employee, also respiratory was on the
- Lisa asked what happened an hour later. Deb stated that Christina found the next discrepancy at 1:36 (2:36 due to time change). There were 3 RN's (one was a float) also 1 PCA on the floor.
- This time it was down again to 63 pills instead of 66. Three more were now missing and the mangled sleeve was gone. They called Lori McDonald and George McGovern from the Pharmacy. They also ask Jeff from Pharmacy for a report on that pyxis. He had to get it from the pharmacy. Demetri came with report for that drawer. They left this discrepancy unsolved. Lori looked at it with the RN's and they decided to wait for Paul K. to come up.
- Debra stated that not reporting it was her stupidity. Lynn S, stated "It happens
 everywhere, because RNs are so busy. It's common practice, but I'm not saying its
 right.

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Cynthia Barry -

We met with Ms. Barry on November 2, 2015 at 11:30 AM,

Present at this meeting: Lisa Gillum, Associate Chief Nurse Officer, Larry Owens, Respiratory Therapy Supervisor, Will Erickson, SHARE Union Representative, and Connie St. Amand, Business Partner

- Lisa explained that there was a med discrepancy on S3, on the evening/night of.
 Saturday, 10/31 in to Sunday, 11/l and that Cynthia had been scheduled to work on that floor. She stated that based on the report, Cynthia had gone in the drawer at times that coincided with the times the meds went missing and asked if she could provide any information.
- Cynthia stated she was covering that floor on that night, but said she is "at a loss" and "can't imagine" this happening.
- Lisa also explained that we have notified the DPH and DEA and that we are looking at all activity where meds were missing. Cynthia's response was "sure - ya - Oh".
- Lisa explained the sequence of times that the count was correct, where Cindy accessed the pyxis, and that the next time count was incorrect.
- Lisa explained the times that this happened and that it happened twice. Cindy's
 response was "That's not good". I don't know how to respond to that, I'm not a thief. I
 know missing meds need to be investigated; but I don't know how to respond to you."
- Lisa then talked about the incidents that had occurred on S-6, where there were other discrepancies, a total of 3 in the past 2 months. She stated that we looked at all access to see commonality of people who were in at those times. She stated that she, Cynthia, was the only employee who was present and the one and only constant between these incidents.
- Cynthia stated, our meds are not in the same places in all pyxis machines. Lisa stated that we checked to see if anyone floated to South 6 and the answer was they had not. Cynthia responded, "I have no information to offer on that". Lisa asked if she noticed anything and told her there was also some tampering with the drawer. Cynthia could not offer any information.
- At that point Lisa, Larry and I left the room and Will, the SHARE representative remained
 with Cynthia. After about 10 minutes Will came out and sort of nodded his head that he
 believed she had taken the meds. She did not offer any more information to him
 however, this was just his opinion.
- We went back into the room and again she was told that all the evidence pointed to her because she is the common factor in all of the past and current incidents.
- she was told the initial report was filled with DPH and that the pyxls information was sent to them as well. Also told that she will most likely be interviewed by them. She

responded, "Sure, a-ha, ok I see, right I understand.... Lisa told her that she is not allowed to work. Cynthia responded, "I'm not going to admit to something I didn't do".

- Again she was reminded that if she has any information about this or the past incidents to please let us know.
- Lisa explained that the April incident in the E.D. has also gone to DPH. Cynthia stated, "that's fine". If I had a problem, I'd get help." I don't mean to be glib. I don't know what else to offer." We explained that this is very serious. Cynthia stated, "Someone has a problem, it's a felony to steal drugs".
- We informed her that Valerie Wedge was here from EAP, due to the seriousness of the incident and that she can speak to her! Lisa stated that she was concerned about Cynthia's well being, and Cynthia responded, "I understand that".
- Cynthia then stated, "How do we know the nurses did not do it?" Lisa's response was that they reported it right away. She also explained that Cynthia went into pyxis and then the next time the nurse went in, count was wrong. It was 2 nurses. Also these nurses were not on S6 or the ED like she was.
- Larry Owens once again repeated the timeline of 10/31 into 11/1. We explained again that these nurses were not on S6 and that it was the same drawer in which the albuterol was kept in.
- Lisa then asked that when Larry called her to tell her she was on paid leave and not to come in, did she have any thought as to what this was about? Cynthia responded that she knew there was an altercation on Saturday morning in the Respiratory Department, so she thought it was about that, (however later she made the following statement "I didn't sleep last night because I was so concerned about this". (this did not make sense because if she thought it was about a fight then why was she worried, because she was not involved in any altercation)
- Then she said. You said the drawer was tampered with, that's concerning.
- She later made the following statements: "didn't sleep last night concerned about this"
- "If I have to quit my job, I will". "I'm not looking at you as the bad guys, you're doing your
 job".
- "I'll go home and think about this to see if there is anything else I can think of".

The meeting ended and Cynthla did not want to meet with Valerie Wedge from EAP.

- Lisa asked Lynn, what she would do it she found a mangled pack and empty broken blister pack with broken pieces of tab at the bottom? Lynn stated, "I'd call charge nurse".
- Debra stated that she thought it got caught in the drawer and Lynn responded, "I know, I
 was just going to say that."
- Lisa asked, when you are in charge, what is your role, beginning to end?
- Debra responded, We check the pyxis, but I did not do that that night. I was running late so I didn't do that this time.
- Paul and Lorl came up and saw the tab was missing and there was a piece of tape there. Deb had not noticed the tape before. There were also small particles still when Paul took box.
- Lisa stated that meds are in different drawers because of the size needed to house them. Tab is designed for tamper evident not tamper proof. Nurses don't necessarily check tabs.
- Lisa asked Deb if she was aware of the issues on S 6. Deb responded no, not until Sunday AM, she had no idea, none what so ever, "I must be out of the loop".
- Deb stated that she called Heather the last nurse in there but never heard back. She also emailed Brian then she was off on Sunday and Monday and returned to work on Tuesday at 7 PM. That is when she learned about the nurse on S6 who lost her job. Lynn mentioned the MNA is making pins for her??
- Connie asked Deb if she has learned something from this and she stated, "Oh my God yes".
- Lisa told Deb that her license and policy talk about how to report this properly etc. She stated that she should not have corrected the count. It not about count being correct its about missing pills. She and the other nurses could still have given meds to patients even if unresolved. Leaving the count unresolved would have been the way to do it correctly. By fixing the count you are saying this issue was resolved, however it was not. You should have wasted crushed pill since you can't give to patient. When you resolve a discrepancy you are saying you know what happened. Should have left discrepancy in tact and unresolved.

We have concluded our investigation of multiple pyxis discrepancies. We conclude that a common individual (Cynthia Barry), a respiratory therapist was involved in 4 different discrepancies.

- 4/23/2015 report to DPH and DEA involving a loss of 10 tablets of HYDROcodone/APAP. A pyxis discrepancy occurred in the ERNS pyxis location when a failed drawer occurred. Discrepancy involved a respiratory therapist names Cynthia Barry (CB). I received an attestation from CB stating that she was not aware of any discrepancy created.
- 9/10/2015 report to DPH and DEA involving a loss of 8 tablets of oxycodone/APAP on South 6. 2
 discrepancies were created and CB accessed the drawers in between when the two
 discrepancies were created,
 - o 8/29/2015 16:38 Pyxis count 60.1 2 tablets removed to bring count to 58
 - CB access drawer on 8/30/2015 at 01:53;45, 02:29:54, 02:29:54, 02:30:00 (drawer left open), 02:30:09 (drawer closed), 02:32:26, 02:32:32 (drawer left open), 02:32:48 (drawer closed), 02:35:11, 02:35:16 (drawer left open), 02:35;31 (drawer closed), 02:36:27, 02:36:50, 02:37:04, 02:45:29, 02:45:29, 04:50:42,
 - o 8/30/2015 05:21: Discrepancy was found expected count 58, found 53 8/30/2015 16:27 count correct at 52
 - O CB accessed drawer on 8/31/2015 01:00:27,01:03:56 (drawer left open), 01:06:57 (drawer closed), 04:59:19
 - O Discrepancy of 3 tablets expected 52 found 49 was found on 9/4/2015 (missing 2 tabs and one empty blister packet to make 3 tablets)
 - CB was the only person that had accessed this drawer in common with the other drawer access reports.
- 10/29/2015 report to DPH and DEA involving a loss of 8 tablets oxycodone/APAP on South 6. Weekly inventory on 10/21/2015 was correct at 61 on 07:37. One tablet was removed on 10/21/2015 to bring count to 60. On 10/23/2015 count was 60 prior to removal of 2 tablets at 12:27 count should have been 58. On 10/28/2015 (next weekly inventory, count was found to be 50, instead of 58.
 - On 10/31/2015, a nurse (Cindy) called to report that she identified a finger size hole in one of the top corners of the cubic pocket. There was also powder residue in bottle of cubic that could potentially be why we had an empty blister pack.
 - o Tablets can be easily removed from this opening with a clamp.

Christine Wilcox -

We met with Ms. Wilcox on November 9, 2015 at 7 AM

Present at this meeting: Lisa Gillum, Associate Chief Nurse Officer, Michael Montalvo, Business Partner, Lynne Starbard, MNA Union Rep. Connie St. Amand, Business Partner

- Christine stated there was a discrepancy on \$3. She stated she floated to \$3 and was checking her patients. Patient in 301 needed pain meds. (Oxy) She went to pyxis... one bubble pack was ripped open and pill was missing. The count was off as well. There should have been 72, but counted 68 or 69 (counting the crushed pill). She called the charge nurse Deb Miville to count with her. They counted decided to include the pill missing. She called pharmacy (George) to report this. He said someone would be up to look into it.
- About 1 ½ 2 hours later, her patient in rm 303 need 5 mg (prisoner). She went to pyxis the empty bubble pack was gone she called the same nurse and they thought someone must have thrown it away. The count was off by 3 pills again. They asked the other nurse on the floor if she saw anything and then they called Lori, Supervisor and George in Pharmacy who said the day Pharmacist would come up. At about 6 or 6 AM she told Paul Khebolan, the day pharmacist, about the ripped bubble pack. He noticed that the tape on cube in upper right corner was gone. He asked her if she had noticed that and she said no. There was a hole in the cube.
- Lisa asked that at midnight when you knew you had a discrepancy and you resolved the discrepancy, did you let anyone know? She stated she called Heather in the morning (didn't want to wake her). She asked if there was an empty bubble pack and if she counted at that time? Heather said there weight? pills and there was no bubble pack ripped when she left.
- Lisa stated, when there is a discrepancy, we should not resolve it. Christina said, I didn't resolve it. Lisa, you did resolve it. Christina stated that there was still a red box in corner. Lisa said, you didn't notice tape? Christina, No I didn't notice tape was broken.
- Three pills were missing first time, count was fixed; and then 3 more missing and bubble
 pack gone. The count was off by total of 6 pills. We weren't sure if there was 68 or 69,
 because we didn't know if she should count the pill in bubble pack.
- Lisa asked, was bubble pack attached? Christina answered yes, I was surprised. I have never seen how bubble pack was ripped like that looked like it was with teeth. They were looking for the pill but only found pieces; of the pill in the drawer.

1 %

South 3

Drawer access history 10/31/15-11/1/15

HD accessed 2051 count correct

CB accessed at 2229 for albuterol

11/1/15 0002 CW accessed discovered 2 missing oxy IR 5 mg pills and an empty bilster pack-(3 total) count corrected

11/1/15 CB accessed at 0059 for albuterol

11/1/15 0136 CW accessed and discovered empty blister pack had been removed and an additional 3 oxy iR 5 mg pills missing.

Discrepancy noted on South 6

10/28/15- discovery date last verified count 10/23/15 at 1227

We reviewed all staff accessing drawer – between 10/23 and 10/28 when discrepancy found and compared to the staff accessing S3 drawer on 10/31 and 11/1. CB was the only person that accessed both drawers. Neither nurse on S3 10/31-11/1 had been on S6 during that time range.

Discovery date 8/30/15 0521 last verified count 8/29/15 0505

CB was the only person that had accessed this drawer in common with the other drawer access reports.

In all cases, albuterol was in the same drawer as the opiod. We reviewed the nurses medication history prediscrepancy. No issues identified with med pulls and administrations with 1 exception that had been addressed previously.

Reports provided by Pharmacy attached.

April 24, 2015

Angel Amaral, Pharm D.
Manager, Pharmacy Operations
UMass Memorial Medical Center
Memorial Campus

This is in response to your request for a statement of what happened when a discrepancy was created in the emergency room pyxis on April 17/

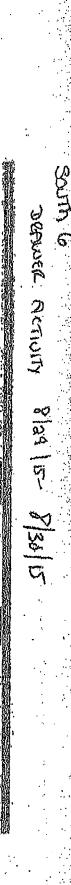
I remember that Friday night was exceptionally busy in the emergency room. At some point, mid shift, I entered the pyxis for ordered medication of albuterol and ipratropium bromide for a patient. The carousel mechanism jammed leaving another pocket exposed. The pyxis stated that the drawer was inoperable and needed to be recovered. I asked if anyone would help to recover the drawer, and a nurse signed in as witness.

At that point, I closed the drawer, as instructed, and the message indicated that the drawer was now operational. I removed my medications and was not aware of any discrepancy created.

I hope this statement clarifies any discrepancy that was generated.

Sincerely,

Cynthia Barry, BS, RRT.



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- End of Report

2015 08:35 Sun Nov/01/ ALL STATION EVENTS REPORT SETUP PARAMETERS FOR UMASS MEMORIAL #1163 . 119 BELMONT STREET WORCESTER, MA 01605 START TIME 1 10/31/2015 00:00 END TIME 1. 11/01/2015 08:34 SORT MODE : BY STN/MED (ABOUT STATION ' oxyoodone IR 5 mg tablet MED NAME MED CLASS USER NAME : ALL USERS : ALL PATIENTS PATIENT NAME *** Only a partial report of the last day can be generated *** 0 = UNKNOWN, 1 = Miso. Controlled A, 2 = Controlled C-II, 3 = Controlled C-III, 4 = Controlled C-IV, 5 = Controlled C-V, C = Non-Pyxis Med, M = Non-controlled B, Med Classes: U = Non-controlled A LOCATION: Ting. VCFIATEA MED NAME: oxyCODONE IR 5 mg tablet ID: CLASS: 2 Controlled C-II 1020 ALT ID: BRAND: OXYCODONE IR 1020 10/31/2015 00:00 CHUCKER By: RODRIGUÉZ, MIA (Digtroon) Ordas Number: 32 Rooms 1381 A For Patients **有以到的**有關係 Ded: Thin is short Acting (Immediate Helepsel: ACKHOWLDOGED 16/31/20L5 00:1] GYI HIVILLE, ONBRA 5-01 (2.)()1b); -Order pumbpri 20 1309 A Rodel For pottents · Ded: This is Short Acting () mmediate Release): ACHICAUSDGED [0/31/2015 00:22 RESTOCKEU OY: HIVILER, DEDIKA 5-01 HOST, KNYKER J Order Himbers 20 hanswill A colf liana: · Por Patient: nedt nemoved by: HIVILER, DEIRA (S3HID) on: 10/31/2015 (011) at drawer: 5-01. 10/31/2015 00:23 By: MITTILD, ORARA Order Numbury 16 Boom: for Parlent! This is short horing (Immediate Astonse): ACKHOWNEDGED

ವರ್ಷ_ ೧೮೪ 3I, 2015 ALL STATION EVENTS report setup parameters for UMASS MEMORIAL #1163 119 BELMONT STREET WORCESTER, MA 01605 # 10/21/2015 00:00. # 10/31/2015 09:02 # BY STN/POCKET START TIME END TIME SORT MODE STATION/DWR/PKT W A68/4 MED CLASS " ALL CLASSES 4 ALL USERS 4 ALL PATIENTS USER NAME PATIENT NAME Only a partial report of the last day ban be generated *** 0 = UNKNOWN, 1 = Misc. Controlled A, 2 = Controlled C-II, 3 = Controlled C-III, 4 = Controlled C-IV, 5 = Controlled C-V, C = Non-Pyxis Med, M = Non-controlled B, U = Non-controlled A LOCATION A68 Activity Had Name * Brand Nama 3 C Drawer: 10/28/2015 09118 Orange opened undapectedly 10/28/2015 09:19 DRANGA CLOSED DRAWER LOFT OPEN 10/29/2015 15:39 By: NACE, ANGEL RPH (NACEA) 10/91/2015: 07/91 DRAWER LEET OPEN By: NADOLSKI, MEREDITH DRAWER CLOSED 10/31/2018 07:41 By: Radolski, Herdolth (HOIBJOHAH) albuterol concentrated 0.59 1243 albukerol concentrated 6.59 2.5 mp / 0.8 mt nebulizer

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COMMONWEALTH OF MASSACHUSETTS TRIAL COURT SUPERIOR COURT DEPARTMENT

WORCESTER, ss.	CIVIL ACTION NO.	
	16-0	889
CYNTHIA A. BARRY,) Plaintiff)		
v .	FIL	ED
UMASS MEMORIAL MEDICAL CENTER) UMASS MEMORIAL HEALTHCARE,)	JUN 16	2016
Defendant)	ATTEST:	rly as

MOTION FOR APPOINTMENT OF SPECIAL PROCESS SERVER AND ORDER OF APPOINTMENT

In accordance with the provisions of Rule 4C of the M.R.C.P., the undersigned hereby requests this Honorable Court for the appointment of a Constable from the Offices of George & Associates as process server in the above entitled action in order to assure a substantial savings in time. The undersigned swears that to the best of his knowledge and belief the persons to be appointed process server is a Constable who is experienced in the service of process, and is not a party to this action.

Allowod Trokens Auspland

6-22-16

RESPECTFULLY SUBMITTED, Plaintiff, Cynthia A. Barry.

By her attorney

Howard J. Potash, Esquire 390 Main Street, Suite 542 Worcester, MA 01608

(508) 754-2624 BBO# 404160

Dated: May 31, 2016

Law Offices HOWARD J. POTASH

Suite 542 390 Main Street Worcester, Massachusetts 01608

> (508) 754-2624 Facsimile (508) 754-0866

> > June 1, 2016

Hand Delivered

Civil Clerk's Office Worcester Superior Court 225 Main Street Worcester, MA 01608

RE: Cynthia A. Barry v. UMass Memorial Medical Center and UMass Memorial Healthcare

Dear Sir/Madam:

Enclosed herewith please find for filing and docketing in regard to the captioned matter Complaint, Motion for Special Process Server and Civil Action Cover Sheet together with our firm's check in the amount of \$275.00.

Thank you for your continued assistance.

Very truly yours,

Howard J. Potash

HJP/emn Enclosures

cc: Mrs. Cynthia A. Barry

COMMONWEALTH OF MASSACHUSETTS TRIAL COURT SUPERIOR COURT DEPARTMENT

WORCESTER, ss.	CIVIL ACTION NO.
CYNTHIA A. BARRY, Plaintiff).
v.).).
UMASS MEMORIAL MEDICAL CENT UMASS MEMORIAL HEALTHCARE, Defendant	ER))

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RESPECTFULLY SUBMITTED, Plaintiff, Cynthia A. Barry, By her attorney,

Howard J. Potash, Esquire 390 Main Street, Suite 542 Worcester, MA 01608 (508) 754-2624 BBO# 404160

Dated: May 31, 2016